

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF ILLINOIS**

KENNETH BALL,)
)
Plaintiff,)
)
vs.) Case No. 3:15-cv-00660
)
HARVARD COLLECTION SERVICES, INC.,)
)
Defendant.)

**SECOND CONSENT MOTION FOR EXTENSION OF TIME TO ANSWER OR OTHERWISE
PLEAD**

Defendant, HARVARD COLLECTION SERVICES, INC. (“HCS”), by and through its undersigned counsel, and pursuant to Federal Rule of Civil Procedure 6(b), respectfully requests that this Court grant a fourteen (14) day extension of time, or up until August 13, 2015, to file a responsive pleading to Plaintiff’s, KENNETH BALL (“Plaintiff”), Complaint. In support thereof, HCS states as follows:

1. Plaintiff filed his Complaint against HCS on June 12, 2015, alleging violation of the Fair Debt Collection Practices Act (“FDCPA”), 15 U.S.C. § 1692 *et seq.* Doc. No. 1.
2. On July 15, 2015, the Court granted HCS’s Consent Motion for an Extension of Time to Answer (Doc. No. 5) by July 30 so HCS could fully investigate Plaintiff’s allegations and so the parties could engage in settlement discussions with the hopes of resolving matter before HCS incurred the additional costs to prepare and file a response. Doc. No. 6.
3. The parties have since began settlement negotiations and it is HCS’s belief that the parties are making excellent progress and a settlement is likely.

4. Accordingly, HCS requests a final, brief fourteen (14) day extension to file its responsive pleading, with the sincere belief that the parties will reach a settlement agreement before a response is due.

5. This request is made for good cause, not meant for purposes of unnecessary delay and will not prejudice any party in the litigation.

6. HCS's counsel has conferred with Plaintiff's counsel, who does not object to a fourteen (14) day extension.

WHEREFORE, HCS respectfully requests this Court grant an extension of time up to and including August 13, 2015, to file a responsive pleading to Plaintiff's Complaint.

Respectfully submitted,

Date: July 30, 2015

/s/ Adam T. Hill
Adam T. Hill
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CERTIFICATE OF SERVICE

I hereby certify that on July 30, 2015, a true and correct copy of the foregoing was filed with the Clerk of Court using the CM/ECF system, which will provide notice to all counsel of record.

/s/ Adam T. Hill
Adam T. Hill